

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

IN RE: TAASERA LICENSING LLC, PATENT LITIGATION	Case No. 2:22-md-03042-JRG
THIS DOCUMENT RELATES TO: CASE NO. 2:22-cv-00303-JRG CASE NO. 2:21-cv-00441-JRG	
TAASERA LICENSING LLC, Plaintiff, v. TREND MICRO, INC., Defendant.	Case No. 2:21-cv-00441-JRG JURY TRIAL DEMANDED

**NOTICE OF MOTION TO COMPEL COMPLIANCE WITH SUBPOENA FOR
DOCUMENTS AND TESTIMONY**

Defendant Trend Micro Incorporated (“Trend Micro Japan”) hereby submits this Notice informing the Court that a Motion to Compel Taasera, Inc. to Comply with Subpoena for Documents and Testimony is currently pending in the District of Delaware. The Motion was filed as Misc. No. 1:23-mc-00463-UNA pursuant to Fed. R. Civ. P. 45(d) and 37(a) on October 5, 2023.

Notice of the Subpoena was provided to all MDL counsel on July 28, 2023. Taasera Inc., original assignee of several of the patents-in-suit, is a Delaware corporation. The Subpoena was served on Taasera Inc.’s agent in Dover, Delaware on August 2, 2023, seeking production of documents and testimony in Delaware. No response to the Subpoena has been received. Plaintiff’s counsel have indicated they do not represent Taasera, Inc., and attempts to identify counsel for Taasera Inc. have been unsuccessful. Defendant has therefore been unable to confer with any counsel for Taasera Inc. regarding the Subpoena or potential compliance therewith.

Dated: October 6, 2023

Respectfully submitted,

/s/ Melissa R. Smith

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***Counsel for Defendant Trend Micro,
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Plaintiff's counsel of record was served with a true and correct copy of the foregoing document by electronic mail on October 6, 2023.

/s/ Melissa R. Smith